

EXHIBIT B

AGNIFILO INTRATER

April 3, 2025

VIA EMAIL

AUSAs Comey, Foster, Johnson, Slavik, Smyser, Steiner
United States Attorney's Office
Southern District of New York
26 Federal Plaza, 37th Floor
New York, New York 10278

Re: *United States v. Combs*, 24-cr-542 (AS)

Dear AUSAs Comey, Foster, Johnson, Slavik, Smyser, Steiner:

Based on your request following our conferrals regarding Conor McCourt, and pursuant to Federal Rule of Criminal Procedure 16(b)(1)(C), this letter provides disclosure that the defense may offer testimony by Conor McCourt that the government views as expert testimony. As discussed in previous conferrals, the parties agree that Mr. McCourt's testimony at the upcoming trial in connection with enhancing audio and visual images would not be expert testimony. However, the government's position is that Mr. McCourt's proffered testimony regarding the available video files depicting the Intercontinental Hotel on March 5, 2016 may be expert testimony. To that end, we are enclosing Mr. McCourt's affidavit attached to the defense's motion *in limine* to preclude all available video files. The subject matter of Mr. McCourt's testimony regarding this matter, and the opinions that he has formed regarding the videos, are set forth in the affidavit.

Respectfully,



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